

Youth Soccer and Recreation Development Program – 2003 Public Comments

TOPIC	COMMENT	VENUE	RESPONSE
Matching Funds			
Cash Match	For other programs, legislation has recently been introduced waiving entire cash matches. There needs to be consistency whether or not the cash match is going to be required to avoid confusion among agencies. There should be a cash amount required and points should be awarded for providing a cash match.	Public Hearing	Every program has different requirements concerning the match. This program states “preference to those communities that provide matching funds”
Match Amount	A small agency may only be able to come up with a \$1,000 match for their project, whereas a larger agency may be able to come up with a \$500,000 match.	Public Hearing	There is no set amount of match for this program. The criteria talks about having a committed match. If you have a committed match for this program you will get the 5 points.
Non-Cash Match	Book-keeping is a nightmare for non-cash match sources.	Public Hearing	Comment considered. No change to the procedural guide.
Payment Process			
Alternatives	Agencies are having a cash flow problem with spending money upfront and then requesting a reimbursement. Agencies need an educational process for the available options/alternatives when applying for funding (80% advance) upfront. Need technical assistance in this area.	Public Hearing	Keep in touch with your project officer and we will go over this again in our technical assistance work shops.

Project Selection Criteria			
Criteria # 1	Point values in the criterion focuses on unemployment, low-income and high crime areas. There needs to be a positive value for low unemployment rates, low crime areas, etc. in neighborhoods that are able to keep well-maintained facilities as well as improve a quality of life. These types of agencies/communities need to have recognition and be given some consideration for doing something right.	Public Hearing	This statement is directly from legislation. It states that preference be given to those areas that “are heavily populated, low-income urban areas with a high youth crime and unemployment rate”.
	What would be the point count for Criteria # 1 if the project is NOT in a low-income urban area but has a Moderate to High deficiency in facilities.	E-mail	The applicant may score between 10-19 points depending on the circumstances.
	How do you determine what is moderate, high, etc.	E-mail	The criterion is left open for the Applicant’s benefit. The more evidence that is documented will determine high, moderate, etc.
Criteria # 1 & 3	Submitting information about crime and unemployment statistics (Criterion 1) and population density and youth population (Criterion 3) may be inhibiting for CBO’s. When this information is available, it can be costly to obtain. The 2000 Census website makes some of these statistics	Written	Comment considered. No change to the procedural guide.

	<p>available, but use of the website requires skill and experience that the staff of many small CBO's may not have. Because community-based non-profit organizations are in an especially precarious position in terms available funding in this difficult economy, this requirement could be prohibitive, and make it impossible for many organizations to receive Resource Bond funding. Because anecdotal evidence may not apply here, State Parks should supply a database of the required information or should describe several locations (libraries, other agencies, and online resources) where the information is accessible.</p>		
Criteria # 1	<p>Gathering information about park deficiencies (Criterion 1) may be difficult for CBOs if they are required to cite a data source other than personal knowledge. State Parks should consider personal knowledge to be acceptable with anecdotal support.</p> <p>If any proof other than anecdotal evidence is required, this may be overly burdensome for small, nonprofit, community-based organizations. In this case, State Parks should either provide required information</p>	Written	Comment considered. No change to the procedural guide.

	in a database or should describe several locations (libraries, other agencies, and online resources) where the information is accessible.		
Criteria # 4	Criterion 4 scores projects that have no user fees higher than projects with user fees. Unfortunately, small groups often need supplementary user fees, but the application for Resource Bond money favors those who do not implement a fee system. User fees are inherently unfair, but they may be required at times.	Written	Comment considered. No change to the procedural guide.
Criteria # 4	In the case of the description of user fees (Criterion 4), as well as in other point classifications, the determining factors for points allotted are vague, unclear, and too subjective. Points are allotted for fulfillment of each criterion, and based on a scale indicated in the Draft guidelines. But the scale is too vague: it distinguishes between “user fees that <u>may</u> deter some residents” and “user fees that <u>will</u> deter some residents” (p 16). How is this determined? Where is the line drawn between a project manager who has “adequate” experience and one who has “limited” experience (p 18)? The vague and subjective nature of these point allocations will favor municipalities.	Written	Comment considered. No change to the procedural guide.

Criteria # 6	<p>Criterion 6, matching contributions, may also create scoring disadvantages for CBOs, because the only contributions that they receive may be non-monetary donations from the community. Although earlier in the document it states that matching contributions can include volunteered time and supplies, these sources should be elaborated upon clearly in Criterion 6. Otherwise, CBOs may neglect to mention them and score poorly.</p> <p>State Parks should assist CBOs by grading community collaboration and local business support as equivalent to monetary sources. This focus would mean emphasizing community and local business donations of time and supplies in the language of Criterion 6.</p>	Written	Comment considered. No change to the procedural guide.
Criteria # 8	<p>Criterion 8 asks for a long-term maintenance plan, including “funding and other resources.” Because CBOs do not have ongoing funding like other applicants, they may have difficulty finding funding sources for future maintenance. State Parks should elaborate on the “other resources” aspect of Criterion 8, spotlighting community and local business donations of time and supplies, which may</p>	Written	Comment considered. No change to the procedural guide.

	<p>be easier for CBOs to secure. These existing resources can be developed to address park maintenance in the long term.</p> <p>Additionally, because CBOs have less experience than many other applicants, State Parks should work with them to develop long-term maintenance plans that emphasize community collaboration, including the formation of “friends of the park” societies and use of existing neighborhood watch groups.</p>		
Funds Available			
Grant Fund Availability	Grant fund availability reimbursement should be clearer. The date the cost can or must be incurred to be reimbursed.	Public Hearing	Grant funds are not available until appropriated in the State Budget.
Application Deadline	Deadline says March 1, 2004 but it should say July 30, 2004.	E-mail	Corrected the problem.
Definitions			
Urban	Continue with the having no definition of Urban in the guide.	Public Hearing	Comment considered. No change to the procedural guide.
Service Area	Would like the definition of service area defined in the guide.	Public Hearing	Comment considered. No change to the procedural guide.
	Would like the service area to stay the way it is in the guide.		Comment considered. No change to the procedural guide.
Open on Weekends	Clearer definition of open on weekends as far as charging for the interest of revenue.	Public Hearing	Comment considered. No change to the procedural guide.

	Examples are soccer tournaments. What does open on the weekend mean?		
Administrative Provisions			
Fidelity Bond	Fidelity Bond Insurance: The Draft Procedural Guide indicates that <u>all</u> non-profit organizations applying for money under this program <i>must</i> have Fidelity Bond Insurance. If this is something that not all CBOs would otherwise have, and if it is costly, it will be another limiting factor in whether or not small organizations can actually apply for this funding, and will, again, favor municipalities.	Written	Comment considered. No change to the procedural guide.
Timeline			
Timeline Issues	Timeline Issues: The long period of time between now and the application deadline, and the undefined time between application submission and notification of grant make Resource Bond money difficult to use. Especially in Los Angeles, where open land is scarce, although an organization may site a piece of land and decide that that is the place on which they will build and develop with the Resource Bond money, it may be unable to act in time. By the time the application is approved and the first payment installment made, that piece of land will likely be sold to another party who has the money at the ready.	Written	Comment considered. No change to the procedural guide.

	<p>Additionally, the Draft Procedural Guide does not anywhere outline the amount of time between application submission and decision notification. It is unclear if applicants will have to wait one month or one year to find out whether they have secured Bond Act funding.</p>		
Eligible Projects			
Eligible Projects	<p>Programmatic vs. Capital Improvement Support: The Draft Procedural Guide explicitly states that Resources Bond Act money can be used <u>only</u> for development or purchase of land, or capital improvements. This not only favors municipalities, but also denies funding to community-based organizations that, although they cannot afford to buy and develop parcels of land, are developing community programming in partnership with land owners/managers. Most CBOs cannot secure the funding to purchase land, especially when a 10 or 20-year tenure of that land is required. This, combined with the lack of support for programming, disadvantages CBOs and favors municipalities.</p>	Written	Comment considered. No change to the procedural guide.
General			
General Comment	<p>In general, the application requires that the potential grantee fulfill eight criteria, each</p>	Written	Comment considered. No change to the procedural guide.

	<p>requiring paperwork, data analysis, or future projection; the effort required for all these combined may be too great for small CBOs. While the large possible awards may make each and all of these steps necessary, it would be better to require smaller grants, such as below \$100,000, to complete no more than one or two steps. Additionally, the manpower required to assemble the application materials may make it impossible for some understaffed CBOs to collect the necessary documents. There could be an intermediate step that would eliminate this problem: a grant candidate organization could submit a first batch of documentation that State Parks would then review. If the organization's materials indicate that it is a contender for money from the 2002 Resources Bond Act, then it could be invited to submit further documentation. This would allow CBOs to complete the onerous, but necessary, tasks in stages, and only if there is a good chance that they will receive bond money for their efforts.</p>		
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